

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of Three USPS Priority)
Mail parcels, currently in the custody of the United) Case No. **2:24-MJ-00855**
States Postal Service in City of Industry, California)

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property:

See Attachment A

located in the Central District of California, there is now concealed:

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☒ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Possession with Intent to Distribute Controlled Substances
21 U.S.C. § 846	Conspiracy and Attempt to Distribute Controlled Substances
21 U.S.C. § 843(b)	Unlawful Use of the Mails to Facilitate the Distribution of a Controlled Substance

The application is based on these facts:

See attached Affidavit

☒ Continued on the attached sheet.

/s/ Zachary Sumpter

Applicant's signature

Zachary Sumpter, United States Postal Inspector

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: _____

Judge's signature

City and state: Los Angeles, CA

Honorable Michael R. Wilner, U. S. Magistrate Judge

Printed name and title

AUSA: Declan T. Conroy (x2872)

ATTACHMENT A

PARCELS TO BE SEARCHED

The following United States Postal Service ("USPS") parcels seized from the mail stream on February 13, 2024, are currently in the custody of the United States Postal Inspection Service in City of Industry, California.

a. **SUBJECT PARCEL 1** is a USPS Priority Mail parcel bearing tracking number 9505 5141 0374 4043 2107 29. **SUBJECT PARCEL 1** is a brown colored, large-sized cardboard box. **SUBJECT PARCEL 1** is addressed to "Jose Lopez, 579 Hill St., Gallatin, TN 37066." The return address listed on **SUBJECT PARCEL 1** is "James Taylor, 1034 W 8th St., Corona, CA 92882." **SUBJECT PARCEL 1** was postmarked on February 12, 2024, in the 91729 zip code.

b. **SUBJECT PARCEL 2** is a USPS Priority Mail Express parcel bearing tracking number EI 542 753 098 US. **SUBJECT PARCEL 2** is a brown colored, large-sized cardboard Box. **SUBJECT PARCEL 2** is addressed to "Lashonda Rupert, 3828 Granges St, Gulf Port, MS 39501." The return address listed on **SUBJECT PARCEL 2** is "Joe Heng, 2801 W. Mission Rd, Alhambra CA 91803." **SUBJECT PARCEL 2** was postmarked on February 12, 2024, in the 91803 zip code.

c. **SUBJECT PARCEL 3** is a USPS Priority Mail Express parcel bearing tracking number EI 092 508 560 US. **SUBJECT PARCEL 3** is a brown colored, medium-sized cardboard box. **SUBJECT PARCEL 3** is addressed to "JuleAnn Owen, 844 Aspen Way 84040, Layton UT." The return address listed on **SUBJECT PARCEL 3** is "Bryan Medina, 740 Sandia Ave, 91746 La Puente CA." **SUBJECT**

PARCEL 3 was postmarked on February 13, 2024, in the 91715 zip code."

ATTACHMENT B

ITEMS TO BE SEIZED

The following items are to be seized from the SUBJECT PARCELS described in Attachment A, which constitute evidence, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) (distribution and possession with intent to distribute a controlled substance); 846 (conspiracy to distribute or possess with intent to distribute a controlled substance); and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance):

- a. Any controlled substances;
- b. Currency, money orders, bank checks, or similar monetary instruments in quantities over \$1,000; and
- c. Any associated packaging materials.

AFFIDAVIT

I, Zachary Sumpter, being duly sworn, declare and state as follows:

I. INTRODUCTION

1. I am a Postal Inspector with the United States Postal Inspection Service ("USPIS") and have been since 2006. I am currently assigned to the Contraband Interdiction and Investigation - North Team of the Los Angeles Division, which is responsible for investigating drug trafficking violations that involve using the United States Mail to distribute controlled substances and/or controlled substances proceeds.

2. As part of my training to become a Postal Inspector, I completed a twelve-week Postal Inspector basic training course, which included training on how to investigate narcotics trafficking via the United States Mail. I also completed an advanced training course specifically designed for training investigators of narcotics mailers and shippers.

3. I have completed thousands of hours of criminal investigations, including compiling information; interviewing victims, witnesses, and suspects; and collecting evidence to support criminal charges. I have worked with other experienced state and federal law enforcement officers and supervisors and have gained knowledge and experience from them. My work has involved preparing and assisting in the drafting and service of numerous search warrants.

4. Furthermore, as part of my law enforcement duties, I have conducted numerous parcel investigations that have resulted

in the arrest of individuals who have received and distributed controlled substances, as well as the seizure of illegal drugs and proceeds from the sale of illegal drugs.

II. PURPOSE OF AFFIDAVIT

5. This affidavit is made in support of an application for a warrant to search the following parcels (collectively, the "SUBJECT PARCELS"), as described more fully in Attachment A, which were shipped through the United States Postal Service ("USPS") and are currently in the custody of USPIS in City of Industry, California:

a. A USPS Priority Mail parcel bearing tracking number 9505 5141 0374 4043 2107 29 ("SUBJECT PARCEL 1");

b. A USPS Priority Mail Express parcel bearing tracking number EI 542 753 098 US ("SUBJECT PARCEL 2");

c. USPS Priority Mail Express parcel bearing tracking number EI 092 508 560 US ("SUBJECT PARCEL 3").

6. The requested search warrant seeks authorization to seize evidence, fruits, and instrumentalities of violations of 21 U.S.C. §§ 841(a)(1) (distribution and possession with intent to distribute a controlled substance), 846 (conspiracy to distribute or possess with intent to distribute a controlled substance), and 843(b) (unlawful use of a communication facility, including the mails, to facilitate the distribution of a controlled substance) (the "SUBJECT OFFENSES"), as described more fully in Attachment B.

7. Attachments A and B are incorporated by reference.

8. The facts set forth in this affidavit are based on my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all my knowledge of or investigation into this matter. Unless specifically noted otherwise, all conversations and statements described in this affidavit are provided in substance and in part only.

III. SUMMARY OF PROBABLE CAUSE

9. Each SUBJECT PARCEL meets certain criteria common to packages containing contraband, including that they were excessively taped, contained handwritten labels, lacked business account numbers, and, according to law enforcement databases, contained sender and recipient names that were not associated with their respective listed addresses.

10. Additionally, on February 13, 2024, a trained drug detection dog alerted to each of the SUBJECT PARCELS for the presence of drugs or other items, such as the proceeds of drug sales that have been contaminated by drugs.

IV. STATEMENT OF PROBABLE CAUSE

11. Based on my training and experience, my conversations with other Postal Inspectors who specialize in drug investigations, my review of law enforcement reports, and my own participation in this investigation, I know the follow:

A. Background on Use of Mail for Drug Trafficking

12. Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In the early 1990s, Postal Inspectors in Los Angeles, California, began conducting organized interdictions of Priority Mail Express and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances. Postal Inspectors also regularly examined and investigated Priority Mail Express and Priority Mail parcels. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances, in the form of cash, using boxes.

13. Although Postal Inspectors still see boxes used to send for controlled substances and cash, there has been a gradual change over the years toward the current trend of using smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances, which lend a sense of legitimacy to the parcel's appearance.

14. Los Angeles is a significant source area for controlled substances. Controlled substances are frequently transported from the Los Angeles area via the United States Mail, and the proceeds from the sale of controlled substances are frequently returned to Los Angeles area via the United

States Mail. These proceeds are generally in the form of money orders, bank checks, or similar monetary instruments in amounts over \$1,000. Based on my training and experience, I know that proceeds from the sale of controlled substances often contain the odor of controlled substances because they have been contaminated with or associated with the odor of one or more controlled substances.

15. Drug traffickers often use one of two USPS services: Priority Mail Express, which is the USPS overnight/next day delivery mail product, or Priority Mail Service, which is the USPS two-to-three-day delivery mail product. Drug traffickers use the Priority Mail Express delivery service because of its speed, reliability, and the ability to track the parcel's progress to the intended delivery point. Drug traffickers use the Priority Mail delivery service because it allows drug traffickers more time for travel between states if they decide to follow a shipment to its destination for distribution. Also, by adding delivery confirmation to a Priority Mail parcel, drug traffickers have the ability to track the parcel's progress to the intended delivery point, as if the parcel had been mailed using the Priority Mail Express Service.

16. Based on my training and experience, and the collective experiences that my fellow Postal Inspectors who specialize in drug investigations have related to me, I know that the following indicia suggest that a parcel may contain drugs or drug trafficking proceeds:

a. The parcel is contained in a box, flat cardboard mailer, or Tyvek envelope;

b. The parcel bears a handwritten label, whether USPS Express Mail or Priority Mail;

c. The handwritten label on the parcel does not contain a business account number;

d. All the seams of the parcel are taped or glued shut;

e. The parcel emits a particular odor of a cleaning agent or adhesive or spray foam that can be detected by a human; and

f. Multiple parcels are mailed by the same individual, on the same day, from different locations.

17. Parcels exhibiting some of these characteristics are the subject of further investigation, which may include verification of the addressee and return addresses, and examination by a trained drug detection dog.

18. I know from my experience and training that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identities from law enforcement officers investigating these types of cases. Indeed, it is my experience that to the extent real addresses are ever used, it is only to lend an appearance of legitimacy to the parcel, and is almost always paired with a false name.

B. Initial Investigation of the SUBJECT PARCELS

19. On February 13, 2024, during routine parcel inspections at the City of Industry Processing and Distribution

Center, I determined that the SUBJECT PARCELS met some of the initial suspicious characteristics as described above.

Specifically, I determined the following:

a. **SUBJECT PARCEL 1** is a USPS Priority Mail parcel bearing tracking number 9505 5141 0374 4043 2107 29. **SUBJECT PARCEL 1** is a brown colored, large-sized cardboard box. **SUBJECT PARCEL 1** has a handwritten label and does not contain a business account number. According to law enforcement records, the return address listed on **SUBJECT PARCEL 1** - "1034 W 8th St., Corona, CA 92882" - appears to be a legitimate address but is not associated with the listed sender, "James Taylor." The recipient address listed on **SUBJECT PARCEL 1** - "579 Hill St., Gallatin, TN 37066" - appears to be a legitimate address and is not associated with the listed recipient, "Jose Lopez".

b. **SUBJECT PARCEL 2** is a USPS Priority Mail Express parcel bearing tracking number EI 542 753 098 US. **SUBJECT PARCEL 2** is a brown colored, large-sized cardboard Box. **SUBJECT PARCEL 2** has a handwritten label, and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 2** - "2801 W. Mission Rd,, Alhambra CA 91803" appears to be legitimate address, but it is not associated with the listed sender, "Joe Heng". The recipient address listed on **SUBJECT PARCEL 2** - "3828 Granges St, GulfPort, MS 39501" appears to be a legitimate address, and is associated with the listed recipient, "Lashonda Rupert."

c. **SUBJECT PARCEL 3** is a USPS Priority Mail Express parcel bearing tracking number EI 092 508 560 US. **SUBJECT**

PARCEL 3 is a brown colored, medium-sized cardboard box.

SUBJECT PARCEL 3 has a handwritten label and does not contain a business account number. According to CLEAR database records, the return address listed on **SUBJECT PARCEL 3** - "740 Sandia Ave., 91746 La Puente CA," appears to be legitimate address, and is associated with the listed sender, "Bryan Medina". The recipient address listed on **SUBJECT PARCEL 3** - "844 Aspen Way 84040, Layton UT" appears to be a legitimate address, but it is not associated with the listed recipient, "JuleAnn Owen."

C. Drug-Detection Dog Alerts to the SUBJECT PARCELS

20. On February 13, 2024, based on the suspicious characteristics of the **SUBJECT PARCELS**, Chino Police Department Officer Angel Bran had his trained drug detection dog, "Cyra," examine the exterior of the **SUBJECT PARCELS**. I learned from Officer Bran that Cyra gave a positive alert to **SUBJECT PARCEL 1 through SUBJECT PARCEL 3** separately, indicating the presence of controlled substances or other items, such as the proceeds of controlled substances, which have been recently contaminated with the odor of controlled substances. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, are documents setting forth information provided by Officer Bran regarding Cyra's training and history in detecting controlled substances, and the examination of **SUBJECT PARCELS 1 through 3**.

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V. CONCLUSION

21. For the reasons set forth above, there is probable cause to believe that the items listed in Attachment B, which constitute the evidence, fruits, and instrumentalities of the SUBJECT OFFENSES, will be found in the **SUBJECT PARCELS**, as described in Attachment A.

Attested to by the applicant in
accordance with the requirements
of Fed. R. Crim. P. 4.1 by
telephone on this 15th day of
February, 2024.

HONORABLE MICHAEL R. WILNER
UNITED STATES MAGISTRATE JUDGE

EXHIBIT 1

AFFIDAVIT

HANDLER ANGEL BRAN AND K9 "CYRA"

I, **Officer Angel Bran**, I have been a Peace Officer since 2013 and have been present at hundreds of drug investigations since the start of my career. I have received formal training from the San Bernardino County Sheriff's Department, Chino Police Department and the California Narcotic Officers' Association on drug recognition and symptomology.

I attended the Adlerhorst Police Dog Handler Course in June 2019 with **Police Service Dog (PSD) Cyra**. I received 240 hours of instruction in basic police dog handling skills. PSD Cyra and I were certified as a patrol team in August 2019. In August 2020, PSD Cyra and I attended the Adlerhorst Police Dog School Drug Detection Class. During this course, PSD Cyra and I receive 240 hours of instruction in the detection of the odor of illegal drugs. In September 2020, PSD Cyra and I passed a certification test in the detection of the odor of illegal drugs. During this course, I personally observed PSD Cyra alert to the presence of the odor of an illegal drug. I am familiar and knowledgeable in the behavior's PSD Cyra engages in when she detects the odor of illegal drugs.

In November of 2020, PSD Cyra and I were recertified in patrol operations by Adlerhorst. In September 2021, 2022, and 2023 PSD Cyra and I were recertified as a patrol team (patrol operations and drug detection) by the Los Angeles County Police Canine Association. I do continual training with PSD Cyra through Adlerhorst International and out in the field during patrol or training sites hosted by different police departments. The training includes various hiding locations including, but not limited to: vehicles, buildings, bags, parcels, and open areas. This training also includes proofing PSD Cyra on novel odors such as: plastic, boxes, latex, tape, metal, money (circulated and uncirculated) and food. I also proof PSD Cyra off my human odor. This training is on-going and continual.

On 02/13/2024 at approximately 1600 hours, Postal Inspector Sumpter asked the assistance of PSD Cyra and I in a narcotic parcel investigation. PSD Cyra alerted to the presence of the odor of an illegal drug emitting from the following:

USPS parcel #1: 9505 5141 0374 4043 2107 29

Addressed to: Jose Lopez

579 Hill St

Gallatin, TN 37066

USPS parcel #2: EI 542 753 098 US

Addressed to: Lashonda Rupert

3828 Granges St

Gulfport, MS 39501

USPS parcel #3: EI 092 508 560 US

Addressed to: JuleAnn Owen

844 Aspen Way 84040

Layton UT



**K9 Officer Angel Bran ID#3655
Chino Police Department**